

Name and address:  
 Virginia B. Flynn  
 Troutman Pepper Locke LLP  
 301 S College Street, 34th Floor  
 Charlotte, NC 28202  
 virginia.flynn@troutman.com

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

<p>Liseth Aguirre  v.  Optum Health Plan of California</p>	<p>Plaintiff(s),  Defendant(s),</p>	<p>CASE NUMBER  5:25-cv-01161-JGB-SP</p>
		<b>APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE PRO HAC VICE</b>

**INSTRUCTIONS FOR APPLICANTS**

- (1) *The attorney seeking to appear pro hac vice must complete Section I of this Application, the certification in Section II, and have the designated Local Counsel sign in Section III. Space to supplement responses is provided in Section IV. The applicant must also attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which he or she is admitted; failure to do so will be grounds for denying the Application. Scan the completed Application, together with any attachment(s), to a single Portable Document Format (PDF) file.*
- (2) *Have the designated Local Counsel file the Application electronically using the Court's electronic filing system ("Motions and Related Filings => Applications/Ex Parte Applications/Motions/Petitions/Requests => Appear Pro Hac Vice (G-64)"), attach a Proposed Order (using Form G-64 ORDER, available from the Court's website), and pay the required \$500 fee online at the time of filing (using a credit card). The fee is required for each case in which the applicant files an Application. Failure to pay the fee at the time of filing will be grounds for denying the Application. **Out-of-state federal government attorneys are not required to pay the \$500 fee.** (Certain attorneys for the United States are also exempt from the requirement of applying for pro hac vice status. See L.R. 83-2.1.4.) A copy of the G-64 ORDER in Word or WordPerfect format must be emailed to the generic chambers email address. L.R. 5-4.4.2.*

**SECTION I - INFORMATION**

Virginia B. Flynn

Applicant's Name (Last Name, First Name & Middle Initial)

check here if federal government attorney

Troutman Pepper Locke LLP

Firm/Agency Name

301 S College Street, 34th Floor

704.916.1509

704.998.4051

Telephone Number

Fax Number

Street Address

Charlotte, NC 28202

virginia.flynn@troutman.com

City, State, Zip Code

E-mail Address

**I have been retained to represent the following parties:**

Optum Health Plan of California

Plaintiff(s)  Defendant(s)  Other: \_\_\_\_\_

Plaintiff(s)  Defendant(s)  Other: \_\_\_\_\_

Name(s) of Party(ies) Represented

<u>Name of Court</u>	<u>Date of Admission</u>	<u>Active Member in Good Standing? (if not, please explain)</u>
North Carolina	6/4/2022	_____
Virginia	2/28/2011	_____
Texas	9/22/2016	_____

List all cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years (continue in Section IV if needed):

<u>Case Number</u>	<u>Title of Action</u>	<u>Date of Application</u>	<u>Granted / Denied?</u>
2:24-cv-08816	Paul Ryan v. Wilshire Law	1/22/2025	Granted
See attached			

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

*Attorneys must be registered for the Court's electronic filing system to practice *pro hac vice* in this Court. Submission of this Application will constitute your registration (or re-registration) to use that system. If the Court signs an Order granting your Application, visit [www.pacer.gov](http://www.pacer.gov) to complete the registration process and activate your e-filing privileges in the Central District of California.*

## SECTION II - CERTIFICATION

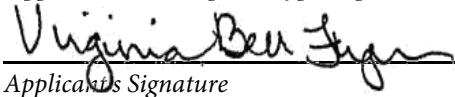
I declare under penalty of perjury that:

- (1) All of the above information is true and correct.
- (2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.
- (3) I am not currently suspended from and have never been disbarred from practice in any court.
- (4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.
- (5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, in which the attorney is physically present on a regular basis to conduct business, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated July 1, 2025

Virginia B. Flynn

*Applicant's Name (please type or print)*



*Applicant's Signature*

**SECTION III - DESIGNATION OF LOCAL COUNSEL**

Chad R. Fuller

*Designee's Name (Last Name, First Name & Middle Initial)*

Troutman Pepper Locke LLP

*Firm/Agency Name*

11682 El Camino Real, Suite 400

858.509.6056

858.509.6040

*Telephone Number**Fax Number*

Street Address

San Diego, CA 92130

chad.fuller@troutman.com

*Email Address*

City, State, Zip Code

190830

*Designee's California State Bar Number*

I hereby consent to the foregoing designation as local counsel, and declare under penalty of perjury that I maintain an office in the Central District of California for the practice of law, in which I am physically present on a regular basis to conduct business.

Dated July 1, 2025

Chad R. Fuller

*Designee's Name (please type or print)**Designee's Signature***SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)**

**All applications by applicant to appear in California courts as counsel pro hac vice or out-of-state arbitration counsel from the date of this application.**

Court/Case	Granted
Orange County Superior Court, Case No. 30-2020-01140434-CU-CO-CJC, <i>Coastline Recovery, LLC v. Anthem Blue Cross Life and Health Insurance Company</i>	3/15/2022
Los Angeles Superior Court, Case No. 21STCV37779, <i>Shane D. Kutasi, by and through his guardian ad litem John P. Kutasi v. Blue Cross of California dba Anthem Blue Cross</i>	1/17/2023
Los Angeles Superior Court, Case No. 22STCV09453, <i>Brittney Crawford v. Blue Cross of California dba Anthem Blue Cross</i>	2/24/2023
American Arbitration Association Case No.: 01-22-0001-6204, <i>Cedars-Sinai Medical Center v. Blue Cross of California v. SAG-AFTRA Health Plan</i>	6/5/2023
Los Angeles Superior Court, Case No. 23STCV14169, <i>John P. Kutasi; Skylar Kutasi v. Blue Cross of California dba Anthem Blue Cross</i>	11/29/2023
American Arbitration Association Case No.: 01-22-0005-1250, <i>Childrens Hospital &amp; Research Center at Oakland v. Blue Cross of California</i>	02/21/2024
JAMS Case No.: 52220001486, <i>Regents of University of California, UC Davis Medical Center et al. v. Blue Cross of California dba Anthem Blue Cross</i>	02/21/2024
American Arbitration Association Case No.: 01-22-0003-6030, <i>Regents of University of California v. Blue Cross of California dba Anthem Blue Cross</i>	02/21/2024



## Certificate of Good Standing

I, Peter G. Bolac, Secretary of the North Carolina State Bar, do hereby certify that

**Virginia Bell Flynn**  
Bar # 59109

was licensed to practice law by the State of North Carolina on June 24, 2022.

Said lawyer is presently an active member of the North Carolina State Bar and is eligible to  
practice law in North Carolina.

Said lawyer is not subject to a pending order of administrative or disciplinary suspension.

Said lawyer's financial account with the State Bar is current.

Therefore, said lawyer is in good standing with the North Carolina State Bar.

Given over my hand and the Seal of the North Carolina State Bar, this the 2nd of January, 2025.

A handwritten signature in black ink, appearing to read "PGB".

Secretary of the North Carolina State Bar



# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

January 02, 2025

Re: Virginia Bell Flynn, State Bar Number 24101258

To Whom It May Concern:

This is to certify that Virginia Bell Flynn was licensed to practice law in Texas on September 22, 2016, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

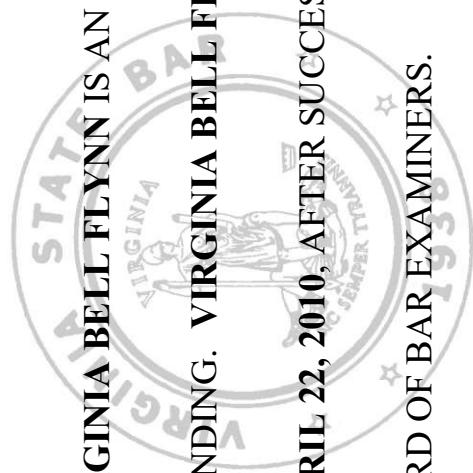
Sincerely,

Seana Willing  
Chief Disciplinary Counsel  
SW/web



# VIRGINIA STATE BAR

## CERTIFICATE OF GOOD STANDING



THIS IS TO CERTIFY THAT **VIRGINIA BELL FLYNN** IS AN ACTIVE MEMBER OF THE  
VIRGINIA STATE BAR IN GOOD STANDING. **VIRGINIA BELL FLYNN** WAS LICENSED TO  
PRACTICE LAW IN VIRGINIA ON **APRIL 22, 2010**, AFTER SUCCESSFULLY PASSING THE BAR  
EXAMINATION GIVEN BY THE BOARD OF BAR EXAMINERS.

Issued January 2, 2025

DaVida M. Davis  
Director of Regulatory Compliance